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Management Plan for Confined Spaces



New Prague Area Schools

Management Plan for Confined Spaces

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New Prague Area Schools* Annual Review Form *Management Plan for Confined Spaces

Created or revised by:	<u>Sue Liebl</u> <small>Print Name</small>	<u>Health & Safety Consultant</u> <small>Print Title</small>
	<hr/> <small>Signature</small>	<u>03/19/2015</u> <small>Date</small>
Reviewed and Accepted by:	<u>Craig Most</u> <small>Print Name</small>	<u>Director of Operations</u> <small>Print Title</small>
	<hr/> <small>Signature</small>	<hr/> <small>Date</small>

Program reviews and follow-up of program-related issues are documented below.

Dates	Action/Comments	Reviewed by:	Accepted by:
03/07/11	Change program contact name	Sue Liebl	
03/05/12	Reviewed – no changes	Sue Liebl	
03/06/14	Reviewed – no changes	Sue Liebl	
03/19/15	Reviewed – no changes	Sue Liebl	

1.0 Introduction

New Prague Area Schools is committed to providing a safe and healthy workplace for all employees. As part of routine maintenance, our employees and contractors are occasionally required to enter potentially hazardous enclosed spaces. The purpose of this written program is to provide information and guidance for safe entry into confined spaces and to comply with OSHA Standard 29 CFR 1910.146 *Permit-Required Confined Spaces*.

Confined spaces meet all of the following conditions: the space is large enough to bodily enter and perform work, the space has limited means of entry and egress, and the space is not designed for continuous worker occupancy. A confined space may require a permit if the space contains, or has the potential to contain, a hazardous atmosphere; contains a material that has the potential to engulf an entrant; has a hazardous internal configuration; or contains any other recognized serious safety or health hazard.

2.0 Program Responsibilities

2.1 Contact Person

New Prague Area Schools has designated Craig Most, Director of Operations as the contact person for the Confined Spaces Program.

The New Prague Area Schools or contracted health and safety consultant shall:

- Conduct/coordinate hazard assessments to determine confined space locations and associated hazards.
- Determine the space classification (permit-required or non-permit space).
- Post appropriate danger/caution signs by each confined space.
- Coordinate and/or conduct supervisory and employee training and maintain records.
- Enforce employee compliance with the confined space entry program.
- Provide appropriate PPE and equipment and train staff on its proper use and maintenance.
- Select qualified individuals as Confined Space Entry Supervisors, entrants, and attendants.
- Provide confined space entry personnel with a copy of the most current confined space entry program and update staff as necessary.
- Maintain completed entry permits.

2.2 Confined Space Entry Supervisors

No employees of New Prague Area Schools have been designated or trained as Confined Space Entry Supervisors, Entrants, or Attendants. Employees of the district are not authorized to enter permit-required confined spaces. Training procedures are found in Section 10.0.

3.0 Workplace Confined Space Evaluations and Reclassification

District staff or the contracted health and safety consultant are responsible for coordinating/conducting an evaluation of the district's facilities to determine if confined spaces are present. The assessment includes the location of each space, a brief description of the space, actual or potential health and safety hazards, and classification of the space (permit-required or non-permit-required). In addition, the "spaces" are assessed for the following hazards:

Thermal Hazards—Hazards due to extremes in hot and cold temperatures.

Engulfment Hazards—Hazards from being overcome by material in a confined space (i.e., steam, gas, water, IDLH atmospheres).

Noise Hazards—Hazards that can affect hearing in emergency situations or two-way communications that may result directly to an injury suffered by an employee.

Slick/Wet Surfaces—Hazards that can increase the risks of slips, trips, or falls. These surfaces may also increase the risks and effects of shocks from electric tools, machinery, and/or circuitry.

Falling Objects—Hazards that exist from loose gravel, cement, tools, etc. that have the potential to cause harm to a worker in a confined space.

Mechanical Equipment—Hazards that may exist due to required machinery operating during an entry.

Electrical Hazards—Hazards that may exist from exposed wiring, power lines, or other faulty equipment.

Fall Hazards—Hazards that may be caused due to loose gravel, exposed wiring, or equipment left in an open area.

Biological Hazards—Hazards that exist from any personal injury that may occur in a confined space.

When there are changes in the use of a non-permit confined space that may introduce new hazards, the space is re-evaluated and classified as a permit-required confined space where necessary.

Reclassification is required for application of solvents, paint chemicals, or other materials that could potentially create a hazardous atmosphere in a confined space, and while performing welding, cutting, brazing, or soldering in those confined spaces with limited or no ventilation.

The confined space assessments and reclassification forms are maintained in the Health & Safety files in the Operation Office and with the contracted health and safety consultant.

4.0 Identification of Confined Spaces

New Prague Area Schools identifies confined spaces by signs, placards, or symbols. These means of warning are printed in English, reading one of (but not necessarily limited to) the following:

CAUTION: NON-PERMIT CONFINED SPACE - AUTHORIZED ENTRY ONLY

DANGER: PERMIT-REQUIRED CONFINED SPACE - DO NOT ENTER

5.0 Entry Procedures for Permit-Required Confined Spaces

Employees of New Prague Area Schools are not allowed to enter permit-required confined spaces. If space classification changes, this plan will be revised, and entry procedures will be implemented.

6.0 Contractor Guidelines

Contractors hired by the district are informed that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting OSHA requirements. The contractor is provided a copy of the permit space assessment (including identified hazards). The contractor is debriefed at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations.

7.0 Non-Permit-Required Confined Spaces

In order to protect the safety and health of employees associated with non-permit required confined space entry, employees (and supervisors) obtain and use the proper PPE, tools, and other equipment necessary to perform the job. Atmospheric testing of a non-permit required confined space is not required; however, testing the atmosphere for toxic gases and oxygen deficiency prior to entering the confined space is recommended if a properly calibrated 4-gas meter is available. An attendant is not required for entry into a non-permit required confined space; however, the district's employees inform other personnel when entering and exiting a non-permit required confined space and utilize two-way radios as appropriate. Other district safety programs (i.e., personal protective and respiratory protection) still apply to entry into non-permit required confined spaces.

Boiler Entry

Prior to entering the confined space of a boiler, the boiler is locked out at each hazardous energy source. In addition, the following occurs before entry:

- The interior temperature of the confined space closely equals the ambient temperature outside that space.
- Hazardous materials (solids and liquids) inside the work area are removed from the vessel.
- Lines leading into and away from the vessel are blanked, blinded, and/or double blocked and bled.

If the above procedures are not followed, the boiler is classified as a permit-required confined space and permit-required entry procedures will be required and implemented.

8.0 Ventilation of Confined Spaces

When a confined space entry requires the use of equipment and tools inside the space, this equipment is inspected prior to use and meets the following requirements:

- Hand tools are in good repair and kept clean.
- Portable electric tools, equipment, and lighting are listed Class I, Division I, and Group D. All grounds are checked and in good working condition. **Note:** Ground fault protectors are used whenever possible to protect employees from electrical shock when working in damp or wet locations.
- Electrical cords, tools, and equipment are constructed of a heavy-duty, double insulated cord, and equipped with a three-prong plug. No two prong plugs are acceptable unless under special circumstances and approved by New Prague Area Schools.
- Electrical cords, tools, and equipment are visually inspected for defects before entering a confined space. Defects include cut or frayed cords, missing ground plugs, and taped cords. If equipment is found defective, it is removed, replaced, and marked "Do Not Use - Out of Service" before any employee enters a confined space.
- It is prohibited to bring compressed gas cylinders into a confined space. The only exemption from this rule is the cylinders that are considered part of SCBA or resuscitation equipment.
- Ladders to be used in confined spaces are constructed of plastic or fiberglass and are adequately secured or of a permanent type which provides the same degree of safety. Permanent ladders used in confined spaces are inspected for rust or corrosion and are repaired or replaced if necessary.
- All equipment that may be used in a flammable atmosphere is approved as either explosion proof or intrinsically safe for the atmosphere and is approved by a recognized testing laboratory (e.g., UL, FM).

9.0 Emergency Service Confined Space Rescue

Although district employees do not enter permit-required confined spaces, we have developed rescue procedures in the event of an emergency.

The New Prague Fire Department has agreed to work as rescue teams in the event of a confined space emergency. The direct phone numbers to the New Prague Fire Department is (952) 758-4401.

In the event of an emergency, the school will dial 911. The call will be directed to the appropriate fire department. Each department has been trained on confined space procedures and retains a copy of the district's confined space inventory. The fire departments rely on mutual aid in the event of an emergency that cannot be handled by one or more of the fire departments.

10.0 Employee Training

District employees are not trained to enter permit-required confined spaces. Employees who are required to enter a non-permit required confined space are trained and properly equipped to recognize, understand, and control hazards that may be encountered during non-permit required confined space entry. Training documentation includes the employee's name, signature of trainer, and training dates. Records are available for review by employees or other personnel.

Training includes:

- Associated safety and health hazards of non-permit required confined space entry
- Location of non-permit required confined spaces
- Air monitoring
- Respiratory protection
- Emergency rescue procedures
- Lockout isolation procedures
- Use of PPE
- Use of equipment such as a 4-gas meter, ventilation, communication devices, or lighting

- Location of permit-required confined spaces and district policy on employee authorization.

Training is provided to affected employees:

- Before the employee is first assigned to confined space duties
- Before there is a change in assigned duties
- Whenever there is change in confined space operations that presents a hazard about which the employee has not been previously trained
- When there are deviations or inadequacies in employee knowledge or use of procedures

11.0 Recordkeeping

Employee training records are maintained in the Operations office in the health and safety files for a minimum of three years.

12.0 Annual Review

Tim Rybak or the contracted health and safety consultant will review the Confined Space Program at least annually, using cancelled confined space permits and other available information and records in order to determine if:

- Changes should be made to improve the program's overall effectiveness
- Additional hazards have been identified within a given space
- Additional measures should be taken to protect the entrants
- Additional confined spaces should be included within the program
- Some locations can be removed from the program.